

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: LIQUID ALUMINUM
SULFATE ANTITRUST
LITIGATION**

*This Document Relates to: Putative Class
of Indirect Purchaser Plaintiffs*

Civil Action No. 16-md-2687
(JLL)(JAD)
MDL No. 2687

Return Date: March 20, 2017

Oral Argument Requested

**NOTICE OF DEFENDANT GEO SPECIALTY CHEMICALS, INC.'S
FED. R. CIV. P. 12(B)(6) MOTION TO DISMISS INDIRECT PURCHASER
PLAINTIFFS' COMPLAINT**

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Attorneys for Defendant GEO Specialty Chemicals, Inc.

PLEASE TAKE NOTICE that on March 20, 2017, at 9:30 a.m., or at such other date and time as may be set by the Court, Defendant GEO Specialty Chemicals, Inc. (“GEO”), by and through its counsel, Kirkland & Ellis LLP and Thompson Hine LLP, will move before the Honorable Jose L. Linares, U.S.D.J., United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Courtroom 5D, Newark, New Jersey 07101, for an Order, pursuant to Fed. R. Civ. P. 12(b)(6), dismissing the Indirect Purchaser Plaintiffs’ Complaint (Dkt. 242) with prejudice as to claims related to any conduct prior to December 31, 2004.

PLEASE TAKE FURTHER NOTICE that in support of this Motion GEO will rely on the accompanying Memorandum of Law, Declaration of Cormac T. Connor and exhibits thereto, and all pleadings and proceedings on file.

PLEASE TAKE FURTHER NOTICE that a Proposed form of Order granting this Motion is being submitted herewith.

PLEASE TAKE FURTHER NOTICE that GEO hereby requests oral argument.

Dated: December 22, 2016

By: /s/ Cormac T. Connor

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